



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
FAX (513) 285-6249

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George V. Voinovich
Governor

August 6, 1997

RE: U.S. DOE-FEMP

HAZARDOUS WASTE
OH6 890 008 976
HAMILTON COUNTY
TSDF/LQG

Mr. Jack Craig, Director
Department of Energy
Fernald Environmental Management Project
P.O. Box 538705
Cincinnati, Ohio 45253-8705

Reference: Letter; 6/25/97, J. Craig, DOE, to T. Schneider, OEPA, "THORIUM MIXED WASTE TREATMENT AND STORAGE IN BUILDINGS 64 AND 65 - FERNALD ENVIRONMENTAL MANAGEMENT PROJECT".

Dear Mr. Craig:

The Ohio EPA Division of Hazardous Waste Management has reviewed the above referenced document. Before we can concur with the stated proposal for interim storage and on-site treatment of the site's remaining thorium inventories, the following additional information is requested:

1. Provide a description of the waste characterization process used to evaluate thorium inventories as mixed waste, including process knowledge and analytical testing. Indicate if thorium mixed wastes will carry a listed or characteristic waste designation. Identify the hazardous waste constituents of thorium mixed waste.
2. Identify the anticipated date for completion of the waste characterization process.
3. Identify the Site Treatment Plan treatment option for thorium mixed waste treatment and the schedule for treatment.
4. Provide information in regard to the present condition of thorium mixed waste containers.
5. Describe physical state of thorium mixed waste and indicate if any free liquids are present.
6. Provide information relevant to mixed waste storage in the Building 64/65 complex, to include a description of the building and location of storage area within the building complex, condition of floor surfaces, secondary containment provisions, and information

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- on any potential incompatibility issues associated with storage at this location. Provide a floor plan of Building 64/65 complex indicating location of proposed interim storage.
7. Ohio EPA is aware of DOE-FEMP's stated ALARA considerations in conjunction with hazardous waste inspection requirements. Please elaborate on the proposal to conduct a weekly inspection of the outside of the Building 64/65 complex. Will this inspection reveal anything about the condition of the containers inside? Is any alternative method of inspection possible?
 8. Describe plans, or facility intentions, with regard to hazardous waste container labeling requirements.

If you should have any questions or comments, please contact me at (937) 285-6090.

Sincerely,



Phillip C. Harris
Division of Hazardous Waste Management

cc: T. Schneider, OEPA OFFO
T. Hagen, FERMCO

